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Attorneys for Defendants
UBER TECHNOLOGIES, INC., RASIER, LLC,
And RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

Jaylynn Dean v. Uber Techs., Inc.,
No. 23-cv-06708

Case No. 3:23-md-03084-CRB (LJC)

**STIPULATION AND [PROPOSED] ORDER
REGARDING DEFENDANTS UBER
TECHNOLOGIES, INC., RASIER, LLC, AND
RASIER-CA, LLC'S MOTION TO PERMIT
EVIDENCE UNDER FRE 412**

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

WHEREAS, Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, "Defendants"), by and through their undersigned counsel, intend to move the Court to admit evidence of Plaintiff's prior sexual assaults and an abortion, pursuant to Federal Rule of Evidence 412 (the "Rule 412 Motion");

WHEREAS, the parties have conferred and agreed to a briefing schedule of the Rule 412 Motion;

WHEREAS, the parties agree that the Defendants shall file their Rule 412 Motion to admit evidence on December 29, 2025;

WHEREAS, the parties agree that the Plaintiff shall file its opposition to Defendants' Rule 412 Motion to admit evidence on January 5, 2026 by 12:00PM PT;

WHEREAS, the parties agree that the Court should hear the motion in camera (as required by Rule 412(c)(2)) at the pretrial conference on January 6, 2026.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, subject to the Court's approval, that the foregoing briefing schedule shall govern Defendants' Rule 412 Motion.

IT IS SO STIPULATED.

DATED: December 29, 2025

Respectfully submitted,

/s/ Andrew Kaufman

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/s/ Laura Vartain Horn

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5 *Attorneys for Defendants*

6 UBER TECHNOLOGIES, INC.,

7 RASIER, LLC, And RASIER-CA, LLC

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9 **ATTESTATION**

10 Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest that all signatories listed, and on whose
11 behalf the filing is submitted, concur in the filing's consent and have authorized the filing.

12
13 DATED: December 29, 2025

14 By: /s/ Laura Vartain Horn
15 Laura Vartain Horn

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-MD-03084-CRB

**[PROPOSED] ORDER REGARDING
DEFENDANTS UBER TECHNOLOGIES,
INC., RASIER, LLC, AND RASIER-CA,
LLC'S MOTION TO QUASH TRIAL
SUBPOENA**

This Document Relates to:

Jaylynn Dean v. Uber Techs., Inc.,
No. 23-cv-06708

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

Pursuant to the foregoing stipulation, and for good cause shown, IT IS SO ORDERED that:

1. Defendants shall file their Rule 412 Motion to admit evidence on December 29, 2025;
2. Plaintiff shall file its opposition to Defendants' Rule 412 Motion on or before January 5, 2026 at 12:00PM PT;
3. The Court will hear the issue during the pretrial conference.

IT IS SO ORDERED.

DATED: _____

By: _____
CHARLES R. BREYER
United States District Judge